

## UNITED STATES DISTRICT COURT

for the  
Southern District of FloridaFILED BY SW D.C.

Mar 15, 2025

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPBUnited States of America  
v.Sadin Miguel Tineo Santana, Sebastiao Cleuber Borges Da  
Cruz, Raul Antonio Moreno-Garcia, and Jermaine Williams

Case No. 25mj8139 WM

Defendant(s)

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 13, 2025 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

## Code Section

## Offense Description

8 U.S.C. § 1326(a)	Illegally Re-Entering the United States (Borges Da Cruz and Moreno-Garcia)
8 U.S.C. § 1326(a) & (b)(2)	Illegal Re-Entry By an Aggravated Felon (Tineo Santana)
8 U.S.C. § 1324(a)(1)(A)(iv)	Encouraging or Inducing an Alien to Enter the United States (Williams)

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

SEAN R COHEN

Digitally signed by SEAN R  
COHEN  
Date: 2025.03.15 11:48:12  
-04'00'

Complainant's signature

Sean Cohen, Special Agent, HSI

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.Date: March 15, 2025  
Judge's signatureCity and state: West Palm Beach, FloridaWilliam Matthewman, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Sean R. Cohen, first being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI) assigned to the HSI West Palm Beach, Florida office. I have been employed by HSI since 2011. I have successfully completed the Criminal Investigator Training Program and Special Agent Training at the Federal Law Enforcement Training Center in Glynco, Georgia. Among my responsibilities as an HSI Special Agent, I am trained and empowered to investigate crimes against the United States, as more fully described in Titles 8, 18, 19, and 21 of the United States Code.

2. The facts set forth in this affidavit are based on my personal knowledge; information obtained in this investigation from others, including other law enforcement officers; my review of documents, pictures, and computer records related to this investigation; and information gained through training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause to support a Criminal Complaint, I have set forth only those facts necessary to establish probable cause to believe that on or about March 13, 2025:

- a. Jermaine Domingo WILLIAMS committed the crime of alien smuggling, in violation of 8 U.S.C. § 1324(a)(1)(A)(iv);
- b. Sadin Miguel TINEO SANTANA committed the crime of illegal re-entry by an aggravated felon, in violation of 8 U.S.C. § 1326(a) and (b)(2); and,
- c. Sebastiao Cleuber BORGES DA CRUZ and Raul Antonio MORENO-GARCIA committed the crime of illegal re-entry after deportation, in violation of 8 U.S.C. § 1326(a).

**PROBABLE CAUSE**

3. On March 13, 2025, at approximately 12:15 AM, a 21-foot cuddy cabin vessel was stopped by a CBP Marine Unit approximately three nautical miles east of Boynton Beach, Florida, within U.S. territorial waters. The vessel had nine people on board.

4. The CBP Marine Unit activated its lights, sirens, and spotlights, allowing a clear and unobstructed view of the vessel's operator, later identified as Jermaine WILLIAMS, who was wearing black pants and a black fleece-style jacket.

5. A Palm Beach Sheriff's Office marine unit and a U.S. Coast Guard vessel also responded.

6. As WILLIAMS and another individual began boarding the CBP Marine Unit, the migrant vessel began to sink, causing the remaining seven passengers, including TINEO, BORGES DA CRUZ, and MORENO-GARCIA, to fall into the water.

7. Law enforcement officers quickly rescued all individuals from the water.

8. All nine individuals were then transferred onto a U.S. Coast Guard cutter for identification and processing. The vessel was left adrift as it continued to sink.

9. Record checks confirmed that:

- a. TINEO SANTANA was previously deported on October 15, 2024, after serving a 103-month sentence for Conspiracy to Commit Hobbs Act Robbery. He did not have permission to re-enter the United States.
- b. BORGES DA CRUZ was previously deported on March 22, 2011 and did not have permission to re-enter the United States.
- c. MORENO-GARCIA was previously deported on October 15, 2024, and did not have permission to re-enter the United States.

10. After being advised of their Miranda rights, the individuals provided the following

statements:

- a. TINEO SANTANA stated that he paid \$4,000 to smugglers to reach Miami, did not have permission to enter the U.S., and identified WILLIAMS as the driver.
- b. BORGES DA CRUZ stated that he paid smugglers \$11,000, knew he needed a visa to return, and identified WILLIAMS as the driver.
- c. MORENO-GARCIA stated that he paid smugglers, intended to enter the U.S. illegally, and identified WILLIAMS as the driver.
- d. WILLIAMS admitted that he piloted the vessel from the Bahamas, was to be paid \$8,000, and knew the passengers lacked lawful status.

**CONCLUSION**

11. Based on the above facts and information, I submit there is probable cause to believe that on or about March 13, 2025:

- a. Jermaine Domingo WILLIAMS committed the crime of alien smuggling, in violation of 8 U.S.C. § 1324(a)(1)(A)(iv);
- b. Sadin Miguel TINEO SANTANA committed the crime of illegal re-entry by an aggravated felon, in violation of 8 U.S.C. § 1326(a) and (b)(2); and,
- c. Sebastiao Cleuber BORGES DA CRUZ and Raul Antonio MORENO-GARCIA committed the crime of illegal re-entry after deportation, in violation of 8 U.S.C. § 1326(a).

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

**SEAN R  
COHEN**

Digitally signed by SEAN R  
COHEN  
Date: 2025.03.15 11:49:13  
-04'00'

---

Sean Cohen  
Special Agent  
Homeland Security Investigations

Attested to in accordance with the  
requirements of Fed. R. Crim. P. 4.1.  
by FaceTime, this 15th day of March 2025.

  
\_\_\_\_\_  
THE HONORABLE WILLIAM MATTHEWMAN  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** 25mj8139 WM

**BOND RECOMMENDATION**

DEFENDANT: Sadin Miguel TINEO SANTANA

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Jonathan Bailyn

AUSA: Jonathan Bailyn

Last Known Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Facility: Palm Beach County Jail

\_\_\_\_\_

Agent(s): HSI SA Sean Cohen

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** 25mj8139 WM

**BOND RECOMMENDATION**

DEFENDANT: Sebastiao Cleuber BORGES DA CRUZ

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Jonathan Bailyn

AUSA: Jonathan Bailyn

Last Known Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Facility: Palm Beach County Jail

\_\_\_\_\_

Agent(s): HSI SA Sean Cohen

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** 25mj8139 WM

**BOND RECOMMENDATION**

DEFENDANT: Raul Antonio MORENO-GARCIA

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Jonathan Bailyn

AUSA: Jonathan Bailyn

Last Known Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Facility: Palm Beach County Jail

\_\_\_\_\_

Agent(s): HSI SA Sean Cohen

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** 25mj8139 WM

**BOND RECOMMENDATION**

DEFENDANT: Jermaine WILLIAMS

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Jonathan Bailyn

AUSA: Jonathan Bailyn

Last Known Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

What Facility: Palm Beach County Jail

\_\_\_\_\_

Agent(s): HSI SA Sean Cohen

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)